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September 20, 2023

File No. 34181.63

VIA ECF

Honorable Louis L. Stanton
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Chanel v. WGACA, LLC, et al.*
Introduction of Counsel Yale Galanter
Case No. 18-cv-2253(LLS)

Dear Judge Stanton:

We represent the Defendants What Goes Around Comes Around et al. ("WGACA") and write to Your Honor to alert Your Honor to an issue we would like to raise at the upcoming Pre-Trial Conference this Friday September 22, 2023. WGACA has added a lawyer to its team, namely, Yale Galanter. Mr. Galanter will today be filing an association of counsel. Mr. Galanter will be the lead counsel on this matter moving forward though our Firm will remain as part of the trial team as well. Mr. Galanter will be present at the Pre-Trial Conference on Friday and intends to move orally for Pro Hac Vice admission.

Mr. Galanter was only recently retained and because of his schedule and the time necessary to get up to speed to be prepared to serve as lead counsel, we would request that this case be set for trial no earlier than March of 2024. The Parties had previously advised the Court that the case would be ready for trial in December of 2023. However, because of Mr. Galanter's association in on the case and because of his anticipated role as lead counsel (coupled with the voluminous nature of the evidence and documents in this case), we will be requesting a trial date in March of 2024 or thereafter. We have already consulted with Chanel's counsel on this development and Chanel has indicated they do not agree with our proposed trial schedule and instead wish to move forward with the trial in December of 2023.

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Again, Mr. Galanter will be present at the Pre-Trial Conference this coming Friday and will be prepared to address any issues or questions the Court may have regarding his availability for trial. Thank you and we look forward to our hearing on Friday.

Respectfully,



Daniel C. DeCarlo of
LEWIS BRISBOIS BISGAARD & SMITH LLP

DCD

cc: Counsel for Plaintiff (via ECF)